

STEVE

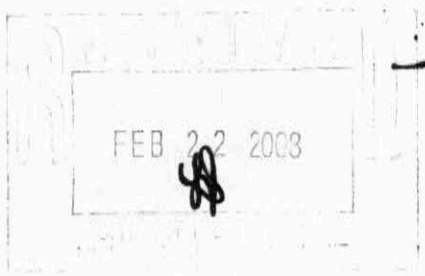
~~Ed Dexter~~



CHILDREN'S ENVIRONMENTAL HEALTH &  
PROTECTION ADVISORY COUNCIL

January 23, 2008

Stephen Pattison  
Assistant Secretary  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230



Dear Mr. Pattison,

The Children's Environmental Health & Protection Advisory Council has reviewed the following proposed regulations for the disposal of coal combustion byproducts:

- Amendments to Regulations .02 and .04 under COMAR 26.04.07 Solid Waste Management
- New Regulations .01-.08 under a new chapter, COMAR 26.04.10 Management of coal Combustion Byproducts
- New Regulation .08 under COMAR 26.20.24 Special Performance Standards
- New Regulations .01-.12 under a new chapter, COMAR 26.21.04 Utilization of Coal Combustion Byproducts in Surface Mine Reclamation

Based on this review, the members of CEHPAC would like to offer the following comments:

1. We strongly support the goals of the proposed regulations to more tightly control the disposal of coal combustion byproducts, a solid waste product which may contaminate local groundwater supplies and endanger public health if improperly managed.
2. We believe the proposed regulations will foster greater protection for all age groups, including children.
3. We encourage the Maryland Department of the Environment to require that a deed amendment be included in land records on a routine basis in order to alert prospective owners and authorities of the existence of a CCB disposal facility and related pollution control features on the site and to remind

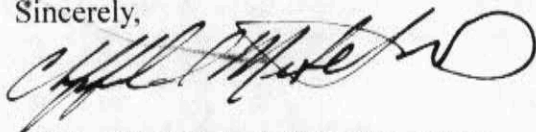
Web Site: [WWW.FHA.STATE.MD.US/CEHPAC](http://WWW.FHA.STATE.MD.US/CEHPAC)  
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owners of their responsibility to manage the site in compliance with existing environmental laws.

4. We also encourage the Department to consider measures that ensure adequate groundwater monitoring on a permanent basis.

On behalf of the Council, I thank you for this opportunity to comment on the proposed regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Clifford S. Mitchell". The signature is fluid and cursive, with a large loop at the end.

Clifford S. Mitchell, MS, MD, MPH  
Chair